

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

JUL 01 2015

David J. Grable, Clerk of Court

UNITED STATES OF AMERICA

V.

**RONALD DEWAYNE HADLEY
LYNDELL LEROY PRICE
LEONDRAY DEMOND GARRISON
aka Leondray Demond Garrison Jackson
aka "Dre" and
RYAN DURON CLAY
aka "ClayDay"**

CRIMINAL NO. H-14-578-S

SUPERSEDING INDICTMENT

The Grand Jury Charges that:

INTRODUCTION

At times relevant to this Superseding Indictment:

1. Defendants RONALD DEWAYNE HADLEY, LYNDELL LEROY PRICE,

Division of the Southern District of Texas.

2. The Internal Revenue Service ("IRS") was an agency of the United States Department of the Treasury responsible for enforcing and administering the tax laws of the United States and collecting taxes owed to the United States.

3. A "debit card" was a card linked to an account at a financial institution, that could be used to receive deposits electronically and to make purchases and cash withdrawals with funds in the account.

4. Defendant **RONALD DEWAYNE HADLEY** resided at the following Houston-area address and ZIP code: [REDACTED]; a McDonald's restaurant at 185 West Road (77037) was approximately 1½ mile(s) from [REDACTED]

5. Defendant **LYNDELL LEROY PRICE** resided at the following Houston-area addresses and ZIP codes: [REDACTED]
[REDACTED]

6. Defendant **LEONDRAY DEMOND GARRISON** resided at the following Houston-area addresses and ZIP codes: [REDACTED]
77088; a McDonald's restaurant at 1819 West Mount Houston Road (77038) was approximately 3 miles from [REDACTED]

7. Defendant **RYAN DURON CLAY** resided at the following Houston-area addresses and ZIP codes: [REDACTED]

COUNT ONE
CONSPIRACY TO SUBMIT FALSE CLAIMS - 18 U.S.C. § 286

8. Beginning on or about October 1, 2011 and continuing through on or about July 1, 2013, the exact dates being unknown to the Grand Jury, in Houston, Harris County, Texas, in the Southern District of Texas, and elsewhere, the defendants,

RONALD DEWAYNE HADLEY
LYNDELL LEROY PRICE
LEONDRAY DEMOND GARRISON
aka Leondray Demond Garrison Jackson
aka "Dre"
and
RYAN DURON CLAY
aka "ClayDay"

did knowingly and willfully combine, conspire, confederate and agree with others known and unknown to the grand jury, to defraud the United States by obtaining and aiding to obtain the payment and allowance of false, fictitious and fraudulent claims.

Object of the Conspiracy

9. It was the object of the conspiracy that defendants **RONALD DEWAYNE HADLEY, LYNDELL LEROY PRICE, LEONDRAY DEMOND GARRISON and RYAN DURON CLAY** and others known and unknown to the grand jury would and did unjustly enrich and attempt to enrich themselves, by obtaining, possessing and utilizing personal identifying information to file and submit to the Internal Revenue Service (IRS), an agency of the United States government, false, fictitious and fraudulent federal income tax returns claiming tax refunds to which they were not entitled.

Manner and Means of the Conspiracy

The manner and means by which the defendants and their co-conspirators sought to accomplish the object of the conspiracy, included the following:

10. Defendants **RONALD DEWAYNE HADLEY, LYNDELL LEROY PRICE, LEONDRAY DEMOND GARRISON and RYAN DURON CLAY** and others known and unknown to the grand jury would and did prepare false, fictitious and fraudulent federal income tax returns claiming tax refunds to which they were not entitled.

11. Defendants **RONALD DEWAYNE HADLEY, LYNDELL LEROY PRICE, LEONDRAY DEMOND GARRISON and RYAN DURON CLAY** and others known and unknown to the grand jury would and did unlawfully obtain, possess, receive from and transfer to one another and others known and unknown to the grand jury identification information and

documents and authentication features, including names, dates of birth, social security numbers and other sensitive personal information, for the purpose of using said identification information and documents and authentication features to prepare and electronically file with the Internal Revenue Service false, fictitious and fraudulent federal income tax returns claiming tax refunds to which they were not entitled.

12. Defendants **RONALD DEWAYNE HADLEY, LYNDELL LEROY PRICE, LEONDRAZ DEMOND GARRISON and RYAN DURON CLAY** and others known and unknown to the grand jury would and did unlawfully possess, obtain, and use identification information and documents and authentication features to obtain and use debit card account routing numbers so that the fraudulently claimed refunds could be direct deposited to debit card accounts, and when so funded by the Department of the Treasury, the funds deposited and credited to the debit card accounts could be converted to cash by using the debit cards linked to those accounts to make withdrawals at local automated teller machines (ATM's) and to make purchases at local businesses.

13. Defendants **RONALD DEWAYNE HADLEY, LYNDELL LEROY PRICE, LEONDRAZ DEMOND GARRISON and RYAN DURON CLAY** and others known and unknown to the grand jury would and did make telephone calls to the Internal Revenue Service and debit card providers to check on the processing and payment status of false, fictitious and fraudulent income tax refunds sought through their scheme.

14. Defendants **RONALD DEWAYNE HADLEY, LYNDELL LEROY PRICE, LEONDRAZ DEMOND GARRISON and RYAN DURON CLAY** and others known and unknown to the grand jury would and did agree to and did share the refunds fraudulently claimed and received.

15. Defendants **RONALD DEWAYNE HADLEY, LYNDELL LEROY PRICE, LEONDRAY DEMOND GARRISON** and **RYAN DURON CLAY** and others known and unknown to the grand jury would and did agree and intend that their scheme would involve false, fictitious and fraudulent tax refund claims totaling several hundred thousand dollars.

Acts in Furtherance of the Conspiracy

16. In furtherance of the conspiracy, and to effect the objects thereof, defendants **RONALD DEWAYNE HADLEY, LYNDELL LEROY PRICE, LEONDRAY DEMOND GARRISON** and **RYAN DURON CLAY** performed and caused to be performed, among others, the following acts :

Acts committed during the 2011 filing season for 2010 tax returns

- (1) Between on or about October 12, 2011 and on or about October 14, 2011, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2010 U. S. Individual Income Tax Return—Form 1040A for Ronald I. with a stated occupation of “barber,” ordinary dividends from “supplies” of approximately \$18,500 and a home address of Ozark claiming an income tax refund of approximately \$5,610;
- (2) Between on or about October 14, 2011 and on or about October 17, 2011, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2010 U. S. Individual Income Tax Return—Form 1040A for Robert M. with a stated occupation of “barber,” ordinary dividends from “supplies” of approximately \$17,850 and a home address of Isabella claiming an income tax refund of approximately \$5,660;
- (3) On or about October 19, 2011, defendant **LYNDELL LEROY PRICE** made or caused to be made a telephone call from 305684-8 concerning debit card account 5082100191255048 in the name of Ronald I.
- (4) On or about October 28, 2011, defendants **RONALD DEWAYNE HADLEY** and **LYNDELL LEROY PRICE** caused an income tax refund of approximately \$5,610 to be deposited from the U.S. Treasury into debit card account 5082100191255048 in the name of Ronald I.

Acts committed during the 2012 filing season for 2011 tax returns

- (5) Between on or about January 1, 2012 and or about January 19, 2012, defendant **RONALD DEWAYNE HADLEY** filed and caused to be filed electronically a 2011 U. S. Individual Income Tax Return-Form 1040A for himself with a stated occupation of "barber", ordinary dividends from "supplies" of approximately \$23,456 and a home address of [REDACTED] West Rd [REDACTED] claiming a refund of income tax withheld of approximately \$6,632;
- (6) Between on or about January 3, 2012 and on or about January 21, 2012, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2011 U. S. Individual Income Tax Return-Form 1040A for Sheldon J. [REDACTED] with stated occupation of "barber", ordinary dividends from "supplies" of approximately \$23,450 and a home address of [REDACTED] Rollins [REDACTED] claiming a refund of income tax withheld of approximately \$6,733;
- (7) Between on or about January 5, 2012 and on or about January 13, 2012, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2011 U. S. Individual Income Tax Return-Form 1040A for Robert M. [REDACTED] with a stated occupation of "barber," ordinary dividends from "supplies" of approximately \$22,897 and a home address of [REDACTED] Alabama claiming a refund of income tax withheld of approximately \$6,560;
- (8) On or about January 19, 2012, defendants **RONALD DEWAYNE HADLEY** and **LYNDELL LEROY PRICE** filed and caused to be filed electronically a 2011 U. S. Individual Income Tax Return-Form 1040A for **LYNDELL LEROY PRICE** with a stated occupation of "barber," ordinary dividends from "supplies" of approximately \$22,931 and a home address of [REDACTED] sabella claiming a refund of income tax withheld of approximately \$6,731;
- (9) Between on or about January 19, 2012 and on or about January 20, 2012, defendants **RONALD DEWAYNE HADLEY** and **LEONDRAY DEMOND GARRISON** filed and caused to be filed electronically a 2011 U. S. Individual Income Tax Return-Form 1040A for **LEONDRAY DEMOND GARRISON** with stated occupation of "barber," ordinary dividends from "supplies" of approximately \$22,190 and a home address of [REDACTED] Montgomery [REDACTED] claiming a refund of income tax withheld of approximately \$6,740;
- (10) Between on or about January 19, 2012 and on or about January 20, 2012, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2011 U. S. Individual Income Tax Return-Form 1040A for Dominique P. [REDACTED] with a

stated occupation of "barber," ordinary dividends from "supplies" of approximately \$21,300 and a home address of [REDACTED] Pine Dr [REDACTED] claiming a refund of income tax withheld of approximately \$6,530;

- (11) Between on or about January 22, 2012 and on or about January 23, 2012, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2011 U. S. Individual Income Tax Return-Form 1040A for Christopher C. [REDACTED] with a stated occupation of "barber," ordinary dividends from "supplies" of approximately \$18,560 and a home address of [REDACTED] Alabama claiming a refund of income tax withheld of approximately \$5,579;
- (12) On or about January 24, 2012, defendants **RONALD DEWAYNE HADLEY** and **LYNDELL LEROY PRICE** caused an income tax refund of approximately \$6,560 to be deposited from the U.S. Treasury into debit card account 5 [REDACTED] 30 in the name of Robert M. [REDACTED]
- (13) On or about January 25, 2012, defendant **LYNDELL LEROY PRICE** made or caused to be made a telephone call from 305684 [REDACTED] concerning debit card account 5 [REDACTED] 30 in the name of Robert M. [REDACTED] into which approximately \$6,560 had been deposited from the U.S. Treasury;
- (14) Between on or about February 10, 2012 and on or about February 11, 2012, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2011 U. S. Individual Income Tax Return-Form 1040A for Don M. [REDACTED] with a stated occupation of "barber," ordinary dividends from "supplies" of approximately \$22,688 and a home address of [REDACTED] Truxillo [REDACTED] claiming a refund of income tax withheld of approximately \$6,755;
- (15) Between on or about April 1, 2012 and on or about April 2, 2012, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2011 U. S. Individual Income Tax Return-Form 1040A for Richard A. [REDACTED] with a stated occupation of "barber," ordinary dividends from "supplies" of approximately \$21,966 and a home address of [REDACTED] Bend claiming a refund of income tax withheld of approximately \$6,377;
- (16) On or about April 1, 2012, defendant **RONALD DEWAYNE HADLEY** and **RYAN DURON CLAY** caused debit card number 4 [REDACTED] 36 to be issued in the name of Richard A. [REDACTED] with an address of [REDACTED] Bend;

- (17) Between on or about April 14, 2012 and on or about April 17, 2012, defendant **RYAN DURON CLAY** used or caused to be used debit card number 40 [REDACTED] 36 issued in the name of Richard A. [REDACTED] with a beginning balance of **\$6,377** to pay [REDACTED] Stereo approximately \$1,450;
- (18) Between on or about April 1, 2012 and on or about April 2, 2012, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2011 U. S. Individual Income Tax Return—Form 1040A for Douglas T. [REDACTED] with a stated occupation of “barber,” ordinary dividends from “supplies” of approximately \$23,745 and a home address of [REDACTED] Sharpton claiming a refund of income tax withheld of approximately \$6,722;
- (19) On or about April 1, 2012, defendant **RONALD DEWAYNE HADLEY** and **RYAN DURON CLAY** caused debit card number 40 [REDACTED] 32 to be issued in the name of Douglas T. [REDACTED] with an address of [REDACTED] Bend;
- (20) On or about May 11, 2012, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2011 U. S. Individual Income Tax Return—Form 1040A for “Dayvyon G. [REDACTED] with a stated occupation of “barber,” ordinary dividends from “supplies” of approximately \$22,398 and a home address of [REDACTED] Square [REDACTED] claiming a refund of income tax withheld of approximately \$6,476;
- (21) Between on or about May 12, 2012 and on or about May 13, 2012, defendant **RONALD DEWAYNE HADLEY** used or caused to be used debit card number 40 [REDACTED] 29 issued in the name of Don M. [REDACTED] with a beginning balance of \$6,755 to pay [REDACTED] Cleaners approximately \$47.50;
- (22) On or about July 1, 2012, defendant **RONALD DEWAYNE HADLEY** used or caused to be used debit card number 4034471018281464 issued in the name of “Dayvyon G. [REDACTED]” with a beginning balance of **\$6,476** to pay [REDACTED] Cleaners approximately \$40.39;
- (23) On or about August 11, 2012, defendant **RONALD DEWAYNE HADLEY** possessed debit card 40 [REDACTED] 64 issued in the name of “Dayvyon G. [REDACTED]” the **\$6,476** balance of which had been withdrawn;

Acts committed during the 2013 filing season for 2012 tax returns

- (24) Between or about January 10, 2013 and on or about January 24, 2013, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2012 U. S. Individual Income Tax Return–Form 1040A for Christopher G with a stated occupation of “barber,” ordinary dividends from “supplies” of approximately \$19,869 and a home address of Bastrop claiming a refund of income tax withheld of approximately \$4,977;
- (25) Between on or about January 10, 2013 and on or about January 24, 2013, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2012 U. S. Individual Income Tax Return–Form 1040A for Ronald L with stated occupation of “barber,” ordinary dividends from “supplies” of approximately \$22,569 and a home address of Isabella claiming a refund of income tax withheld of approximately \$6,142;
- (26) Between on or about January 11, 2013 and on or about January 24, 2013, defendants **RONALD DEWAYNE HADLEY** and **LEONDRAY DEMOND GARRISON** filed and caused to be filed electronically a 2012 U. S. Individual Income Tax Return–Form 1040A for **LEONDRAY DEMOND GARRISON** with a stated occupation of “barber,” ordinary dividends from “supplies” of approximately \$20,930 and a home address of Montgomery claiming a refund of income tax withheld of approximately \$5,944;
- (27) Between on or about January 11, 2013 and on or about January 24, 2013, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2012 U. S. Individual Income Tax Return–Form 1040A for Dominique P with stated occupation of “barber,” ordinary dividends from “supplies” of approximately \$22,580 and a home address of Bastrop claiming a refund of income tax withheld of approximately \$6,293;
- (28) Between on or about January 16, 2013 and on or about January 24, 2013, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2012 U. S. Individual Income Tax Return–Form 1040A for Richard A with stated occupation of “barber,” ordinary dividends from “supplies” of approximately \$23,400 and a home address of Hollister claiming a refund of income tax withheld of approximately \$6,575;
- (29) On or about February 1, 2013, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2012 U. S. Individual Income Tax Return–Form 1040A for Douglas T with stated occupation of “barber,” ordinary dividends

from "supplies" of approximately \$21,688 and a home address of [REDACTED] Hollister [REDACTED] claiming a refund of income tax withheld of approximately \$6,058;

(30) Between on or about January 28, 2013 and on or about January 29, 2013, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically a 2012 U. S. Individual Income Tax Return—Form 1040A for Sheldon J. [REDACTED] with stated occupation of "barber," ordinary dividends from "supplies" of approximately \$21,877 and a home address of [REDACTED] Isabella claiming a refund of income tax withheld of approximately \$5,867;

(31) On or about February 5, 2013, defendant **RONALD DEWAYNE HADLEY** filed or caused to be filed electronically from IP address 64.134.11.121 – then assigned to a McDonald's restaurant at 185 West Road – a 2012 U. S. Individual Income Tax Return—Form 1040A for "Gerald D. [REDACTED]" with stated occupation of "barber," ordinary dividends from "supplies" of approximately \$20,995 and a home address of [REDACTED] Montgomery [REDACTED] claiming a refund of income tax withheld of about \$5,776;

(32) On or about April 16, 2013, defendant **RONALD DEWAYNE HADLEY** used or caused to be used debit card number 45 [REDACTED] 58 issued in the name of Christopher G. [REDACTED] with a beginning balance of \$4,977 to pay [REDACTED] Cleaners approximately \$50; and

(33) On or about July 1, 2013, **LEONDRAY DEMOND GARRISON** sent the following text message to **RONALD DEWAYNE HADLEY**: "We gone try next year r what."

In violation of Title 18, United States Code, Section 286.

COUNTS TWO THROUGH TWENTY-NINE
FALSE CLAIMS - 18 U.S.C. §287

17. On or about the following dates, in the Houston Division of the Southern District of Texas and elsewhere,

RONALD DEWAYNE HADLEY
LYNDELL LEROY PRICE
LEONDRAY DEMOND GARRISON
aka Leondray Demond Garrison Jackson
aka "Dre"
and
RYAN DURON CLAY
aka "ClayDay"

defendants herein, aiding and abetting each other and others known and unknown to the grand jury, knowingly made and presented to the Internal Revenue Service, an agency of the U.S. Department of Treasury, claims against the United States for payment, which defendant knew to be false, fictitious, and fraudulent, by preparing and causing to be prepared, and filing and causing to be filed, the following false claims for refunds of income taxes, in the forms of purported electronically-prepared U.S. Individual Income Tax Returns in the names of the following individuals for the following tax years, claiming the following approximate amounts of refunds, all of which were material, and knowing each such claim to be false, fictitious, and fraudulent:

Count	Name	Tax Year	Approximate Filing Date	Refund Claim
2	Ronald Hadley	2011	01/19/12	\$6,632
3	Don M [REDACTED]	2011	02/11/12	\$6,755
4	Don M [REDACTED]	2012	02/12/13	\$6,766
5	Freddie G [REDACTED]	2011	01/13/12	\$6,432
6	Freddie G [REDACTED]	2012	01/24/13	\$6,233
7	Delma J [REDACTED]	2011	02/03/12	\$6,885
8	Delma J [REDACTED]	2012	01/30/13	\$5,849
9	Lyndell Price	2011	01/19/12	\$6,731
10	Ronald L [REDACTED]	2010	10/14/11	\$5,610
11	Ronald L [REDACTED]	2011	01/13/12	\$6,433
12	Ronald L [REDACTED]	2012	01/24/13	\$6,142
13	Robert M [REDACTED]	2010	10/17/11	\$5,660
14	Robert M [REDACTED]	2011	01/13/12	\$6,560
15	Robert M [REDACTED]	2012	01/24/13	\$5,766
16	Dayvyon G [REDACTED]	2011	05/11/12	\$6,476
17	Dayvyon G [REDACTED]	2012	01/24/13	\$6,006

Count	Name	Tax Year	Approximate Filing Date	Refund Claim
18	Christopher G [REDACTED]	2011	01/23/12	\$5,579
19	Christopher G [REDACTED]	2012	01/24/13	\$4,977
20	Sheldon J [REDACTED]	2011	01/21/12	\$6,733
21	Sheldon J [REDACTED]	2012	01/29/13	\$5,867
22	Leondray Garrison	2011	01/20/12	\$6,740
23	Leondray Garrison	2012	01/24/13	\$5,944
24	Dominique P [REDACTED]	2011	01/20/12	\$6,530
25	Dominique P [REDACTED]	2012	01/24/13	\$6,293
26	Gerald D [REDACTED]	2012	02/05/13	\$5,776
27	Richard A [REDACTED]	2011	04/03/12	\$6,377
28	Douglas T [REDACTED]	2011	04/03/12	\$6,722
29	Danielle D [REDACTED]	2012	02/08/13	\$6,278

In violation of Title 18, United States Code, Sections 287 and 2.

A TRUE BILL:
FOREPERSON OF THE GRAND JURY

SIGNATURE ON ORIGINAL

KENNETH MAGIDSON
UNITED STATES ATTORNEY

By: *SIGNATURE ON ORIGINAL*

Jimmy Sledge Jr.
Assistant United States Attorney